

# EXHIBIT 3



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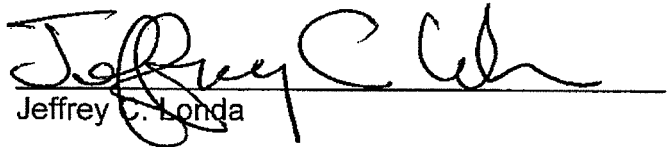
*ATTORNEYS FOR DEFENDANTS  
DELL INC. AND DELL MARKETING USA L.P.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 3<sup>rd</sup> day of September, 2008, the above and foregoing document was mailed by certified mail, return receipt requested, to the following counsel:

George A. Hanson  
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Dallas, TX 75202

  
Jeffrey C. Londa

**GENERAL OBJECTIONS APPLICABLE TO EACH INTERROGATORY**

1. Defendants object to the instructions and definitions accompanying Plaintiffs' First Interrogatories to the extent that the said instructions and definitions attempt to require Defendants to do more than is required by the Federal Rules of Civil Procedure. Defendants further object to the interrogatories to the extent that they attempt to require Defendants to produce any documents because an interrogatory cannot be used to compel production of a document.
2. Defendants object to the instructions and definitions accompanying Plaintiffs' First Interrogatories to the extent that they attempt to require or could be construed as requiring Defendants to disclose information protected by the attorney-client privilege or the attorney work product doctrine.
3. Defendants object to the definition of the term "personnel files" as being overbroad and unduly burdensome.
4. Defendants object to all interrogatories to the extent they are premature (not related to class certification/notice).

**OBJECTIONS AND ANSWERS TO PLAINTIFFS' FIRST INTERROGATORIES**

**INTERROGATORY NO. 1.** Identify the person or persons providing information or answers to these interrogatories and for each person identify for which interrogatories the person provided information.

**ANSWER:** Defendant Dell Marketing USA L.P. ("Dell Marketing") answers as follows:

Michael Hudanik (Interrogatory No. 5)

Lisa Mink (Interrogatory Nos. 2, 3, 4, 14, and 15)

Rocco Pape (Interrogatory No. 14)

Patti Powers (Interrogatory No. 16)

**INTERROGATORY NO. 2.** Identify each and every individual employed by Dell as a business sales representative during the class period, and provide (in Excel format) his or her name, last known address, last known telephone number(s), dates of employment and social security number.

**ANSWER:** Defendants object to this interrogatory because it is overly broad, harassing, premature (not related to class certification/notice), and unduly burdensome. Defendants additionally object to this interrogatory because it seeks information that is confidential, proprietary, and which would invade the privacy of individuals not parties to this lawsuit. Defendants also object to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Defendants also object to Plaintiff's request for documents and documents in a particular format via an interrogatory. Without waiver of the foregoing objections, Defendant Dell Marketing answers by providing the following information concerning the number of business sales representatives at the listed locations on the dates indicated:

<b>NO. EMPLOYED 4/1/05 – 8/8/08</b>				
Texas	Oklahoma	Tennessee	Other	Total
3,842	1,844	2,050	158	7,894

**INTERROGATORY NO. 3.** Identify any and all persons responsible for deciding how business sales representatives employed during the class period were compensated.

**ANSWER:** Defendants object to this interrogatory because it is overly broad, vague, and unduly burdensome. Defendants further object to this interrogatory because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiver of the foregoing objection, Defendant Dell Marketing answers as follows: The compensation for sales representatives is determined by certain individuals from the business, finance, compensation and human resources.

**VERIFICATION**

STATE OF TEXAS           §  
                                     §  
COUNTY OF WILLIAMSON   §

BEFORE ME, the undersigned authority, personally appeared LISA Mink,  
duly authorized agent for Defendant Dell Marketing U.S.A. L.P, known to me to be the  
person whose name is subscribed to the foregoing and after having been duly sworn  
stated on her oath that she has read the foregoing Interrogatory Answers and that the  
information contained in these interrogatories is based on information obtained from  
different individuals and documents but that, to the best of her knowledge, they are true  
and correct.

Lisa Mink

SUBSCRIBED TO BEFORE ME on this 25<sup>th</sup> day of August, 2008.

Katie Melber  
NOTARY PUBLIC  
In and for the State of Texas

